

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

The Estate of Yaron Ungar, et al.,

*Plaintiffs-Judgment
Creditors,*

v.

Orascom Telecom Holding S.A.E.,

Defendant-Garnishee.

Civ. Action No. 07 CV 2572
(CM) (LMS)

**AMENDED NOTICE OF MOTION
TO DISMISS**

PLEASE TAKE NOTICE, that upon its memorandum of law and exhibits filed on May 30, 2007 and entered on June 6, 2007 (Docket No. 8), Orascom Telecom Holding S.A.E. (“Orascom”), by and through undersigned counsel, hereby respectfully moves this Court for an order dismissing Plaintiffs’ First Amended Complaint in its entirety with prejudice (i) pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure for lack of personal jurisdiction over Orascom; (ii) pursuant to Rule 12(b)(1) for lack of subject-matter jurisdiction; (iii) for lack of territorial jurisdiction over the assets at issue; and (iv) pursuant to Rule 12(b)(6) for failure to state a claim for turnover pursuant to N.Y. C.P.L.R. § 5227.

Dated: July 27, 2007

Respectfully submitted,

WHITE & CASE LLP

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